

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re: : Chapter 9
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CITY OF DETROIT, MICHIGAN, : Case No.: 13-53846
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Debtor. : Hon. Steven W. Rhodes
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**DOCUMENT REQUESTS OF INTERNATIONAL UNION, UAW TO THE GENERAL
RETIREMENT SYSTEM OF THE CITY OF DETROIT
REGARDING PLAN CONFIRMATION**

Pursuant to Federal Rule of Bankruptcy Procedure 7034, Federal Rule of Civil Procedure 34 and the Court's April 2, 2014 Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket #3632], the International Union, UAW ("UAW") requests that the General Retirement System of the City of Detroit ("GRS") produce documents responsive to the document requests set forth below upon the undersigned counsel by no later than April 25, 2014.

DEFINITIONS AND RULES OF CONSTRUCTION

1. "UAW's Interrogatories" means the April 11, 2014 Interrogatories of International Union, UAW to the General Retirement System of the City of Detroit Regarding Plan Confirmation.
2. "Document" has the same meaning as set forth in Federal Rule of Civil Procedure 34(a)(1)(A), and includes emails and other electronically stored information.
3. "Concerning" means relating to, referring to, describing, evidencing or constituting.

GENERAL INSTRUCTIONS

1. This Request for Production of Documents shall be continuing in nature and shall include any and all responsive documents discovered, prepared or created after the date of production specified above. All such subsequently-discovered, prepared or created documents responsive to this Request shall be produced promptly, but no later than within seven (7) calendar days of their discovery, preparation or creation.

2. For each document to which any privilege is claimed, identify the party asserting the privilege; the date of, and any title or heading affixed to the document, if any; the name and address of all persons to whom and by whom the document was sent or distributed; the type of document (e.g., letter, memorandum); the general subject matter; and the nature of the claimed privilege.

DOCUMENT REQUESTS

1. GRS's audited financial statements for the year ended June 30, 2012 and for the year ended June 30, 2013.

2. Documents concerning GRS's most recent actuarial valuation.

3. Any and all documents upon which you relied or to which you referred in answering the UAW's Interrogatories.

4. Any and all documents concerning your answers to the UAW's Interrogatories.

Dated: New York, New York
April 11, 2014

International Union, UAW

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CERTIFICATE OF SERVICE

I certify that on this 11th day of April 2014, I caused the foregoing document to be served on counsel for the GRS and for all other parties of record through the Court's CM/ECF system.

/s/ *Peter D. DeChiara*
Peter D. DeChiara